

Episode Quality Improvement Program (EQIP): New Program Designed for Specialists

March 13, 2020

HSCRC
Health Services Cost
Review Commission

Agenda

- ▶ Update on EQIP design
- ▶ EOIP schedule
- ▶ EQIP outpatient-triggered episodes for YI (2021)
 - Orthopedics
 - ▶ Cardiology
 - ▶ Gastroenterology
 - ▶ Emergency Department
- ▶ Appendix I. Glossary and CPT Codes
- ▶ Appendix 2. Info from nationally experienced episode conveners/contractors
- Appendix 3. Overlaps and FAQs
- * State is currently in discussions/negotiations with CMMI on EQIP, thus everything is subject to change.



	Update on EQIP Design*
	* State is currently in discussions/negotiations with CMMI on EQIP,
	thus everything is subject to change.
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Bad News: For years, CMMI has excluded Maryland from many of their models or limited take-up

- ▶ Bundled Payments for Care Improvement Advanced (BPCI Advanced)
- Oncology Care Model (OCM)
- ▶ New Radiation Oncology (RO) Model [proposed]
- ▶ Comprehensive Primary Care Plus (CPC+)

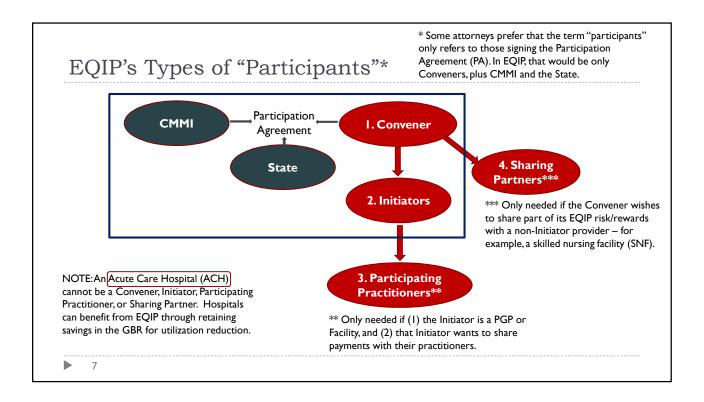
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Good News: Maryland Model* now permits developing our own versions

- ▶ Maryland Primary Care Program (MDPCP started January 2019)
- ► Episode Quality Improvement Program (EQIP)
 - ▶ Expected RFA in Spring 2020
 - ▶ Expected start date January 2021
- Also, CMMI permitting Maryland providers into newest proposed kidney models (ETC [proposed], KCF, CKCC)
- CMMI will permit Maryland providers' participation in their models IF hospitals are not a substantial source of savings
 - ► CMMI can't calculate actual Medicare savings in hospitals because of hospitals' Global Budget Revenue (GBR)
 - ► For EQIP and similar programs, the State will calculate the savings obtained using a methodology approved by CMS
- * Sometimes referred to as the All-Payer Model, the Total Cost of Care (TCOC) Model, or "the Waiver." Of these alternatives, TCOC Model is most accurate. Generically we just say "Maryland Model."

Episode Quality Improvement Program (EQIP): Overview and goals

- ▶ EQIP is an episode-based payment program for non-hospital providers designed to:
 - ▶ Help the State meet the financial targets of TCOC Model
 - Include more providers in a value-based payment framework (that is, to have responsibility and share in rewards for reducing Medicare TCOC spending)
 - ▶ Encourage multi-payer alignment in a value-based payment framework
 - Include more episodes than in CMMI models
 - ▶ Broaden access to Medicare's 5% Advanced APM (AAPM) MACRA opportunity
- As with almost all Maryland Model programs, participants (Conveners in EQIP context) must accept more-than-nominal downside risk
 - ▶ Episode Initiators (e.g., physician partners) can participate through a Convener and agree on risk/reward arrangement
- Targeted start date of January 2021, with RFA Spring 2020
 - ▶ EQIP Conveners, episode initiators, etc., can sign up or withdraw annually
- **>** 6



EQIP's Types of Participants: 1. Conveners

1. Episode Convener

- ▶ Entity that bears the risk (to CMMI an "Advanced APM Entity")
- Legal entity like an ACO, CTO, PGP, or a Participant in BPCI-Advanced
- Respond to Request for Applications (RFA), sign Participation Agreement (PA), and submit Implementation Protocol (IP)
- Expecting no more than a dozen Episode Conveners (but no State/Federal restriction on number)
- ▶ Enter into agreement with Episode Initiators (Els)
- Provide their Episode Initiators with resources and support, for example:
 - ☐ Technical assistance, outreach and education, enrollment support
 - □ Care management resources
 - ☐ Episode management and analytics

EQIP's Types of "Participants": 2. Initiators 2. Episode Initiators Do not sign PA with CMMI and State Medicare suppliers and providers (e.g., doctors) that: | Initiate clinical episodes, | Implement care intervention plans, | Treat patients Enter into agreement with Convener | CMMI and State not a party NPIs like those on: | ACO list, | MDPCP practice roster, or | CRP Certified Care Partner list NPIs must be submitted by potential Conveners to CMMI for vetting (program

integrity). Once approved through vetting, can participate with ONE Convener

EQIP's Types of "Participants": 3. Participating Practitioners 4. Sharing Partners

3. Participating Practitioners

If the Initiator is a PGP or a non-ACH facility, they may want to share payments with their individual downstream practitioners

4. Sharing Partners

The Convener may want to share incentive payments with non-Initiator organizations (e.g., with a PAC facility that is helping reduce readmissions and TCOC but is not an Initiator)

EQIP: Simplified example

- ▶ Convener elects to take responsibility for Medicare TCOC for:
 - ▶ Triggered by [CPT code(s)]
 - ▶ For spending over [90] days
- ▶ The Convener's average Medicare TCOC is \$10,000 per beneficiary
 - ▶ CMS wants its 3% savings: Discount Factor → \$9,700 Target Price
 - Across the Convener's patients, if the Convener's average per beneficiary spending falls below \$9,700 (on risk-adjusted basis, assuming certain quality metrics are met), Convener receives payment from Medicare
 - ▶ On the other hand, average Medicare TCOC above \$9,700* will require a payment from the Convener
- Because Maryland hospitals operate under global budgets, reductions in Medicare hospital utilization do not produce a one-for-one savings to Medicare
 - For net reductions in hospital spending, Conveners will get partial credit of 65%
- ▶ BPCI Advanced has stop-loss/stop-gain of 20% of sum of Target Prices at the Episode Initiator level
- * Consistent with CMMI's BPCI Advanced, which is the primary model for EQIP Note: Care management fees, aka MEOS payments, not part of BPCI Advanced

HSCRC will be releasing a Request for Information (RFI) on EQIP episode design

- ▶ RFI likely to be released early next week
 - Want to take into account comments from today's meeting
- Seeking comments on episode design in four YI outpatient-triggered categories:
 - Orthopedics
 - Cardiology
 - Gastroenterology
 - ▶ Emergency Department
- ▶ Also seeking initial input on priorities and design of Y2 episodes
- Content of RFI will be similar to today's slides
- Due date for comments will be Friday, April 17
 - * State is currently in discussions/negotiations with CMMI on EQIP, thus everything is subject to change. Input may not be taken into account. We will not be including any other YI episode categories besides ortho, cardio, GI, and ED.
 - 12

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	EQIP Schedule*
	* State is currently in discussions/negotiations with CMMI on EQIP, thus everything is subject to change.
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EQIP Documents

State/CMMI provide:

- I. Request for [Convener] Application (RFA) along with attachment/template for vetting potential Episode Initiators, Participating Practitioners, and Sharing Partners
- 2. Participation Agreement (PA)
- 3. Implementation Protocol (IP) template along with attachment/template for final certified Episode Initiators, Participating Practitioners, and Sharing Partners

Every Convener submits:

- Completed Application, including attachment for vetting list of potential Episode Initiators, Participating Practitioners, and Sharing Partners
- 2. Signed PA
- 3. Completed Implementation Protocol, including attachment for final certified Episode Initiators, Participating Practitioners, and Sharing Partners

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D R A F T – "Aiming for" EQIP dates BPCI-A vs. EQIP: Key documents with Conveners

BPCI-A (for effective date of	1/1/20)	EQIP (for effective date of 1/1/21)		
Request for Application (RFA) along with template for potential Episode Initiators (Els) for vetting and for CMMI to produce preliminary target prices	4/18/19	RFA along with template potential Episode Initiators (Els) et al. for vetting and for State to produce preliminary target prices	Spring 2020	
• Application submitted by Participants	Due 6/24/19	Application submitted by Conveners	Due Summer	
CMS provides preliminary Target Prices	September 2019	HSCRC provides data flat file, including preliminary Target Prices (next slide)	Summer 2020	
Participation Agreement (PA) available	Sept. 2019	PA available	Fall 2020	
Signed PA submitted by Participants	Nov. 2019	Signed PA submitted by Conveners	Winter 2020	
Participant Profile template, Care Redesign Plan template, Financial Arrangement list	TBD	Implementation Protocol (IP) Template available, including Certified EI template	Fall 2020	
 Participant Profile, Care Redesign Plan, and Financial Arrangement list submitted 	Nov. 2019	IP and Certified Els submitted	Winter 2020	

EQIP outpatient-triggered episodes for Y1*

* State is currently in discussions/negotiations with CMMI on EQIP, thus everything is subject to change.

Episode Categories for Y1: Limited to Outpatient Triggers

- ▶ Episode categories from BPCI Advanced where CMMI excluded Maryland:
 - Orthopedics
 - ▶ Cardiology
 - ► Gastrointestinal (GI)
- ▶ Emergency Department (ED) triggered

▶ 17

Proposed Episode Triggers for Y1

Orthopedics	Gastrointestinal (GI)	Cardiology	Emergency Department (ED) Triggered*
Knee Replacement & Knee Revision	Colonoscopy	Coronary Angioplasty	Efficient Admissions
Knee Arthroscopy	Gall Bladder Surgery	Pacemaker / Defibrillator	High-Frequency ED Users
Lumbar Laminectomy	Upper GI Endoscopy		
Shoulder Replacement			

^{*} Efficient admissions triggers include ED visits for one of 9 conditions: Chest pain, Syncope, Congestive heart failure, Skin & soft tissue infections, Asthma/COPD, Deep vein thrombosis, Pneumonia, Atrial fibrillation, Hyperglycemia with diabetes mellitus. These may be subsequently split into a greater number of diagnosis-based episodes. High frequency ED use trigger is 4th ED visit within a 12-month period.

Note: CMS will not permit inpatient-triggered episodes to be included in YI, though they may be included in 2022 and beyond

Current Methodology (HSCRC continuing validation)

- Data: Medicare Claim and Claim Line Feed (CCLF; i.e., Medicare-only claims) for the period July 2017-June 2018
- CPT trigger codes will be based upon publicly available definitions
- ▶ Each episode was identified using a CPT trigger from the outpatient claims*
 - Following a given outpatient CPT trigger, any facility claim (inpatient, outpatient, ASC, etc.) within the episode window was included
 - ▶ Episode windows are all currently 90 days except ED episodes, which are 14 days for Efficient Admissions and 30 days for High Utilizer
 - When multiple triggers were observed during the episode window for a single beneficiary, the first trigger was the winning episode (all other costs included but no new episodes triggered)
 - ▶ Episodes lacking a corresponding facility claim ("orphan claims") were dropped
 - Part D prescription drug expenditures were not included
 - To calculate the average payments per episode, all applicable payments during the episode window were totaled, then divided by the total episodes

19

* See Appendix for CPT triggers by category

Potential Orthopedic Episodes & Maryland Spending FY18 Medicare FFS FY18 Medicare FFS Average per 90-Day

Outpatient Orthopedic Episodes planned for EQIP Year I

Potential Inpatient Orthopedic Episodes for EQIP Year 2 pending CMS sign-off

Episode	Episodes	Spending ^I	Episode ¹
Knee Replacement/Revision	2,077	\$10.3 M	\$4,977
Knee Arthroscopy	1,305	\$23.8 M	\$18,222
Lumbar Laminectomy	1,122	\$12.9 M	\$11,490
Shoulder Replacement	145	\$3.2 M	\$21,963
Total	4,649	\$50.2 M	\$10,797
Episode	FY18 Medicare FFS Episodes	FY18 Medicare FFS Spending ¹	Average per 90-Day Episode ¹
Episode Knee Replacement/Revision			
·	Episodes	Spending ^I	Episode ¹
Knee Replacement/Revision	Episodes 4,981	Spending ¹ \$151.6 M	Episode ¹ \$30,445
Knee Replacement/Revision Lumbar Laminectomy	Episodes 4,981 1,862	Spending¹ \$151.6 M \$96.9 M	\$30,445 \$52,027

\$436.1 M

11,900

Chronic & Other Potential Y2 **Episodes**

- Lower Back Pain
- Anterior cervical discectomy and fusion (ACDF)
- Osteoarthritis

1. Cost of trigger event and total cost of care during the 90-day episode window

20

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Potential GI Episodes & Maryland Spending

Outpatient GI Episodes planned for EQIPYear I

Episode	FY18 Medicare FFS Episodes	FY18 Medicare FFS Spending ¹	Average per 90- Day Episode ^l
Colonoscopy	50,928	\$231.6 M	\$4,547
Gall Bladder Surgery	1,172	\$11.0 M	\$9,396
Upper GI Endoscopy	18,184	\$123.3 M	\$6,780
Total	70,284	\$365.9 M	\$5,206

Chronic & Other Potential Y2 Episodes

- Bariatric Surgery
- · Crohn's Disease
- Diverticulitis
- Gastro-Esophageal Reflux Disease
- GI Bleed
- Intestinal Obstruction
- Pancreatitis
- Ulcerative Colitis

Potential Inpatient GI Episodes for EQIP Year 2 pending CMS signoff

21

Episode	FY18 Medicare FFS Episodes	FY18 Medicare FFS Spending ¹	Average per 90- Day Episode ¹
Colonoscopy	2,762	\$119.0 M	\$43,092
Gall Bladder Surgery	997	\$33.6 M	\$33,672
Upper GI Endoscopy	5,511	\$330.6 M	\$59,985
Colorectal Resection	835	\$52.3 M	\$62,665
Total	10,105	\$535.5 M	\$52,993

I. Cost of trigger event and total cost of care during the 90-day episode window

Potential Cardiac Episodes & Maryland Spending

Outpatient Cardiac Episodes planned for EQIP Year 1

Episode	FY18 Medicare FFS Episodes	FY18 Medicare FFS Spending ¹	Average per 90- Day Episode ¹
Coronary Angioplasty	1,505	\$28.5 M	\$18,925
Pacemaker / Defibrillator	2,472	\$56.8 M	\$22,970
Total	3,977	\$85.3 M	\$21,439

Chronic & Other
Potential Y2
Episodes

- Acute Congestive Heart Failure
- Acute Myocardial Infarction
- Arrhythmia / Heart Block / Conduction Disorders
- Heart Failure
- Shock / Cardiac Arrest (SRF)

Inpatient Cardiac Episodes for EQIP Year 2 pending CMS sign-off

22

Potential

Episode	FY18 Medicare FFS Episodes	FY18 Medicare FFS Spending ¹	Average per 90- Day Episode ¹
Coronary Angioplasty	2,218	\$94.8 M	\$42,719
Pacemaker / Defibrillator	1,438	\$75.6 M	\$52,547
CABG &/Or Valve Procedures	1,716	\$142.5 M	\$83,038
Total	5,372	\$312.8 M	\$58,229

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1. Cost of trigger event and total cost of care during the 90-day episode window

Potential ED Episodes & Maryland Spending

Outpatient ED Episodes planned for EQIP Year I

Episode	FY18 Medicare FFS Episodes	FY18 Medicare FFS Spending ¹	Average per Episode ⁱ
Efficient Admissions	32,779	\$117.1 M	\$3,572
High-Frequency ED Users	17,470	\$109.0 M	\$6,242
Total	50,249	\$226.1 M	\$4,500

Breakout of Efficient ED Episodes by Primary Dx, Episode may be split up on this basis

Primary Dx	FY18 Medicare FFS Episodes	FY18 Medicare FFS Spending	Average per Episode
Asthma COPD	3,507	\$11,187,606	\$3,190
Atrial Fibrillation	1,856	\$7,251,423	\$3,907
Chest Pain	13,723	\$50,043,046	\$3,647
CHF	590	\$3,222,577	\$5,462

Primary Dx	FY18 Medicare FFS Episodes	FY18 Medicare FFS Spending	Average per Episode
DVT	771	\$2,643,120	\$3,428
Hyperglycemia	1,304	\$3,802,997	\$2,916
Pneumonia	2,116	\$7,537,753	\$3,562
Skin Infection	3,649	\$9,088,625	\$2,491
Syncope	5,263	\$22,324,553	\$4,242

1. Cost of trigger event and total cost of care during the episode window. Episode window is 14 days for Efficient Admissions and 30 days for High-frequency ED Users. Subject to change based on ongoing analyses and discussions with CMMI

Overview of Episode Design Parameters

- ▶ EQIP Benchmarking and Target Pricing Overview **for Year I**: How Maryland's proposed approach compares to other CMMI model options
- ▶ Key Elements and Maryland Approach
 - Payments
 - ▶ Benchmarks, Adjustments and Target Prices
 - ▶ Assuming and Mitigating Risk
- ▶ EQIP Participants' Potential Savings Strategies
- ▶ Other issues (quality measures, data and reporting, Y2 options)

EQIP Episode Model Elements: Y1 Payments

Element	Element Potential Approach Description		Maryland Approach
Samina	Traditional FFS	Pay through traditional claims method	✓
Service Payments	Benchmark / capitated	Participants can only bill for the benchmark rate or receive a capitated payment	×
Doufoumonoo	Financial performance	Compare target price versus actual payments	✓
Performance Payments	Quality adjustment	Based on performance on quality measures or for specific outcomes	✓
Enhanced Payments	Flat fee / enhanced	CMMI employs population-based payments, enhanced service payments, and flat fee approaches.	×

25

EQIP Model Elements: Y1 Benchmark Methods

Element	Potential Approach	Description	Maryland Approach	
Historical Baseline	1-2 years of Medicare FFS claims	Generally 2-3 years for CMMI models	✓	
Episode Costs	Total cost of care	Either targeted episodes or total cost of care	✓	
	Exclusions	Exclusions may be applied based on beneficiary characteristics, e.g., require full Part A and Part B eligibility	✓	
	Medicare FFS payment rate changes	Use information from published price schedules	✓	
	GBR / MD-HSCRC	Apply separate trend accounting for MD hospital payments	✓	
Trend	Regional / peer date	Base part of trend on regional values or peer groups	×	
	Data Refresh	The baseline can be recalculated using more up to date information to address the lag between the available data and the start of a new model (e.g., new and costlier treatments may become more common)	✓ Baseline ends no later than the CY, 2 years before performance year*	

EQIP Model Elements: Y1 Adjustments

Element	Potential Approach	Description	Maryland Approach	
Discount Factor	(3%) participants CMS may hold back a percentage of the payment rather than		✓	
VACCALL - 1.1	None	CMS may hold back a percentage of the payment rather than attempting to take back some amount in the future, if necessary	nold back a percentage of the payment rather than to take back some amount in the future, if necessary hats do not owe money, then these funds will be released as econciliation process It's own historical experience may be used to adjust the	
Withhold	None	If participants do not owe money, then these funds will be released as part of the reconciliation process		
	Participant	A participant's own historical experience may be used to adjust the benchmark either as part of a blended rating system (e.g. CJR) or for a specific time period	✓	
Historical Experience	MD beneficiaries	Regional experience may be employed as well.	✓ Only for small cell sizes	
	Peer data	Efficiency factors are used to align incentives for participation and avoid the potential for pre-determined winners based only on selection	×	

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EQIP Model Elements: Y1 Adjustments Continued

Element	t Potential Approach Description		Maryland Approach	
	Actual	Payment rates based on actual claims history	✓	
Geography	Standardized	Standardized FFS claims can offset comparisons, but the data will need to be adjusted to reflect actual payment conditions	×	
Outliers		Average episode expenditures can be skewed by a few very high or very low cost outliers		
	Winsorize	Winsorization is used to cap very high expenditures and place a floor on very low expenditures so as to not skew the results; often set at 99th and 1st percentiles	✓	
	Accounting for	Because global budgeting, reductions in Medicare hospital utilization do not produce a one-for-one savings to Medicare	,	
Other	GBR feedback	Episode savings associated with lower hospital spending will be discounted by 35%	√	

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EQIP Model Elements:	Y1	Target Prices
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Element	lement Potential Approach Description			
Target Prices	Target prices will be compared against actual expenditures	Establish a basis for comparison for actual expenditures during a model; calculate actual performance relative to target price, with quality adjustments.	✓ Actual history updated with trend and case mix to performance year and then discounted	
Price Cells	Classify payments into subsets based on setting, diagnosis, etc.	Price cells are related to case mix adjustment as their values should be set to capture important differences in expected costs	Likely	
Reconciliation	One time	The reconciliation process compares actual expenditures versus the target amounts and determines potential participant outlays and payments based on the model rules including quality adjustments		
		Some models incorporate multiple iterations (e.g., OCM has three per performance period)	consideration	

EQIP Model Elements: Y1 Risk Sharing & Mitigation

Element	Potential Approach	Description	Maryland Approach	
	One sided	Participants share in savings (upside only) but do not reimburse losses	×	
Risk sharing		Participants share savings as well as potential losses (downside risk)	,	
Two s	Two sided	Advanced Alternative Payment Models require two sided risk	✓	
	Voluntary	Voluntary participation lets eligible participants choose whether to take- on or avoid risk on an annual basis	✓	
Mitigation	Stop-loss / stop-gain	Provisions that set a threshold beyond which participant exposure (stop-loss) and performance payments (stop-gain) are capped	✓ 20% of the target price at the episode initiator level	
	Winsorize	Winsorization or other methods of reducing the impact of extreme outliers are a way of reducing risk	✓ At 99 th and 1 st percentiles	

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EQIP Model Elements: Y1 Case Mix Adjustment

	Potential Approach	Description	Maryland Approach
	Rate cells	Intended to bucket beneficiaries with similar costs into the general categories	✓
Methods	Risk scores	HCC scores or HCC score categories can be employed to the extent that they predict expenditures well for subsets of beneficiaries.	✓
	Regression	Regression models are employed for OCM, BPCI-A and the proposed Radiation Oncology model	Under consideration
	Demographic	Age and gender	✓
Factors	Diagnosis / Event	For example: APR-DRG, chronic condition status, hip fracture	✓
	Eligibility category	Dual enrollees, for example	Under consideration

Savings Strategy and Relative Impact: Hypothetical Examples

	Type of Spend	Unregulated	Regulated	Regulated	Regulated
Scenario	Savings Strategy	Eliminate	Eliminate	Shift to Cheaper Regulated Setting	Shift to Cheaper Unregulated Setting
	Cost Offset Type	None	None	Regulated	Unregulated
uts	Gross Savings before Offset	\$1,000	\$1,000	\$1,000	\$1,000
Inputs	Cost Offset Amount	\$0	\$0	\$800	\$650
, uo	Net Unregulated Savings (Dissavings)	\$1,000	\$0	\$0	(\$650)
Savings Calculation	Net Regulated Savings (Dissavings)	\$0	\$1,000	\$200	\$1,000
ီ ပီ	GBR Discount (35% of net regulated savings)	\$0	(\$350)	(\$70)	(\$350)
	Net Savings	\$1,000	\$650	\$130	\$0
32					

Example Savings	Calculation	by	Cost Bucket
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				Regulated Costs	Unregulated Costs	Total	Case Mix
	а	Baseline Period Total Costs (1)		\$100,000	\$50,000	\$150,000	
Baseline b	b	Episodes				10	
COSIS	c	Baseline Period Cost per Episode	=a / b	\$10,000	\$5,000	\$15,000	1.00
	d	Performance Period Total Costs (1)(2)		\$80,000	\$55,000	\$135,000	
Performance e Period Costs	e	Episdoes				10	
renou costs	f	Performance Period Cost per Episode	=d / e	\$8,000	\$5,500	\$13,500	1.01
	g	Average Annual Trend (3)		2.0%	3.0%		
	h	Trend Periods in Years (4)		2	2		
Target Price	i	Trended Baseline Costs	= c * (1+g) ^ h	\$10,404	\$5,305	\$15,709	
Calculation	j	Case Mix Adjusted Trended Baseline Costs (5)	= i * f / c	\$10,508	\$5,358	\$15,866	
	k	Target Discount		3.0%	3.0%	3.0%	
	1	Case Mix Adjusted Target Price	= j * (1-k)	\$10,193	\$5,197	\$15,390	
	m	Per Episode Savings (Dissavings) before GBR feedback	= I - f	\$2,193	-\$303	\$1,890	
Savings	n	GBR Discount (Regulated Only)(6)	= m * 0.35	\$767		\$767	
Calculation	0	Per Episode Savings (Dissavings)	= m - n	\$1,425	-\$303	\$1,122	
	p	Total Savings (Dissavings) to Convener before quality adjustment (7)	=o * e	\$14,253	-\$3,032	\$11,221	

- Based on one year \$ paid by Medicare after winsorization
 Assumes increase in unregulated is driven by shifts in site of service
 Actual trends determined annually based on HSCRC GBR update and CMS inflation factors on individual unregulated cost components
 Assumes baseline period is CY2019 and performance period is CY2021
- period is CY2021

 5. Based on ratio of case mix values. More complex case mix adjustment methodologies are under
- GBR discount has no Impact on Unregulated savings
 Final payments from CMS would be adjusted based on the quality results.

consideration.

3

33

Quality Measures

- ▶ To qualify as an Advanced Alternative Payment Model and qualify participants for potential MACRA bonuses, EQIP will need to include quality measures
- ► Convener Reconciliation Payments will be adjusted for quality performance based on individual El performance weighted on episode volume
- Measures will be applied at two levels:
 - ▶ For all episodes regardless of specialty area
 - ▶ Potential MIPS measures: Advance Care Plan (#47), Closing the Referral Loop Receipt of Specialist Report (#374) and Documentation of Current Medications (#130)
 - ▶ Episode-specific
 - TBD. State will aim to align with priority areas for TCOC Model and ongoing quality programs
 - ▶ E.g., THA/TKA Surgical Complications measure (NQF #1550)
- ▶ State plans to vet and discuss potential measures as a part of EQIP subgroup

Proposed Approach for Y2 and Beyond

- Add Inpatient-triggered episodes
- Add Chronic episodes
- ▶ For YI participants, target prices will not be reset (except for normal adjustments for trend and case mix) for at least the first 3 years, except HSCRC may:
 - Adjust for shifts in place of service (eliminating pure shift savings after a more limited period)
 - ▶ For participants starting after YI, set targets based on their start date (for example if the start date is I/I/22, CY20 would be considered for target setting)

35

Data and Reporting Schedule

- Summer 2020: Preliminary Descriptive Analytics
 - ▶ Based on the list of potential Els submitted as part of the RFA, the State will be calculating and providing to potential Conveners a flat file with preliminary target prices and many other variables (e.g. spend by place of service)
 - ▶ File will not include PHI but will include enough information for potential Conveners to do analyses and make decisions
 - File will mirror table shells used by CMS for this purpose
- ▶ After Convener Signs Participation Agreement (late 2020): Claims Detail File
 - Conveners with a signed participation agreement will be able to regularly download detail data about historic and current beneficiary episodes for their participating Els
- ▶ Spring 2021: CRISP Reporting Tool
 - Reporting on completed episodes at a summary level will be available through CRISP Reporting Services. This reporting will also calculate participant savings or dissaving and will reflect official results that will populate CMS payment adjustments

Next Steps

- ▶ The State is releasing a Request for Information (RFI) specific input requested includes:
 - Episode design (see appendix and separate handout on trigger CPT codes)
 - ii. Payment windows and methodologies
 - Trade-off of complete run out versus more timely payment
 - Trade-off of reconciliation window versus earlier payment finalization
 - iii. Episodes to include in Y2 (prioritization)
- ▶ Future EQIP Subgroup will be devoted to discussing:
 - ▶ Potential EQIP episodes for Oncology and Radiation-Oncology
 - ▶ Episode-specific Quality Measures
 - Methodology and RFI feedback

> 37

Appendix 1: Glossary and CPT Codes

Glossary of Terms

- ACO Accountable Care Organizations, or those participating in the CMMI Model.
- > Annual Medicare Savings the annual Medicare TCOC savings per Maryland Medicare Beneficiary as defined in the Agreement.
- Benchmark Price A metric used by the State, together with the Discount Factor, to calculate an Episode Initiator-specific Target Price for each Clinical Episode. The Benchmark Price is calculated based on a combination of historical Medicare FFS spending, adjusted to reflect the Episode Initiator's efficiency relative to its peers, along with adjustments for patient characteristics and regional spending trends.
- Clinical Episode The defined period of time triggered by the provision of a designated trigger service or procedure by an Episode Initiator to an EQIP Beneficiary, during which all Medicare FFS expenditures for all non-excluded items and services furnished to a EQIP Beneficiary are bundled together as a unit for purposes of calculating the Target Price and for purposes of Reconciliation.
- Convener-Initiator Arrangement An arrangement between an Episode Convener and an Episode Initiator that is in writing and satisfies the applicable requirements of the EQIP Participation Agreement. Pursuant to the Convener-Initiator Arrangement, the Episode Convener may: (1) share the NPRA and, if applicable, CIPs paid by CMS to the Episode Convener with the Episode Initiator; and/or (2) apportion to the Episode Initiator some or all of a Repayment Amount owed to CMS by the Episode Convener.
- Discount Factor —A set percentage by which CMS reduces the Benchmark Price in order to calculate the Target Price.
- Downstream Participant An Episode Initiator, Participating Practitioner, Sharing Partner, or Sharing Partner Participating Practitioner
- Episode Care Improvement Program "ECIP" is a Track in the Maryland Care Redesign Program which includes inpatient bundles for Hospital accountability, similar to those included in CMMI's Bundled Care Improvement Program-Advanced.
- Episode Convener An entity that brings together at least two downstream Episode Initiators to participate in EQIP, facilitates coordination among them, and bears full financial risk to CMS under the Program. An Episode Convener may be an entity that is either a Medicare-enrolled provider or supplier or an entity that is not enrolled in Medicare. An Episode Convener may not be a Regulated Maryland Hospital.
- Episode Initiator (EI) A Medicare provider or supplier that has entered into a Convener-Initiator Arrangement with an Episode Convener and that initiates Clinical Episodes through the provision of a designated triggering service or procedure.
- EQIP or Program the Episode Quality Improvement Program under the Maryland Total Cost of Care Model.
- EQIP Track Implementation Protocol Template A form that has been approved by CMS, that is designed to be completed by the Episode Convener and to set forth the Episode Convener's plan for participating in an EQIP Track selected by the Episode Convener.
- EQIP Beneficiary A Maryland Medicare FFS Beneficiary on whose behalf an Episode Initiator submits a trigger claim to Medicare FFS. The term EQIP Beneficiary specifically excludes: (1) Medicare beneficiaries covered under United Mine Workers or managed care plans (e.g., Medicare Advantage, Health Care Prepayment Plans, or cost-based health maintenance organizations); (2) beneficiaries eligible for Medicare on the basis of end-stage renal disease (ESRD); (3) Medicare beneficiaries for whom Medicare is not the primary payer; and (4) Medicare beneficiaries who enter hospice during the Clinical Episode.



39

Glossary of Terms, Cont.

- Maryland Medicare FFS Beneficiary -- An individual enrolled in Medicare Part A or Part B but who is not enrolled in Medicare Part C (Medicare Advantage), and who resides in Maryland.
- Medicare Fee-for-Service (FFS) Medicare Parts A and B, and does not include Part C (Medicare Advantage) or Part D.
- Net Payment Reconciliation Amount (NPRA) the amount paid to the Episode Convener by CMS, if the summed total of Negative Total Reconciliation Amounts and Adjusted Positive Total Reconciliation Amounts for the Episode Convener's Episode Initiators is positive, as specified in the Reconciliation Report.
- Performance Year The 12-month period beginning on January I of each calendar year during the EQIP in which one or more EQIP Tracks is in effect.
- PGP Physician Group Practice which may participate as an Episode Initiator and submit a list of their physicians who
 constitute their Participating Practitioners.
- Reconciliation The annual process of comparing the aggregate Medicare FFS expenditures for all items and services
 included in a Clinical Episode attributed to an Episode Initiator against the Target Price for that Clinical Episode to determine
 whether the Episode Initiator is eligible to receive an NPRA payment from CMS, or is required to pay a Repayment Amount to
 CMS.
- Repayment Amount Monies owed to CMS by the Episode Convener, as determined during Reconciliation.
- > RFI Request for Information, i.e. solicitation of stakeholders for formal design input and feedback to the State.
- Sharing Partner A physician group practice (PGP), accountable care organization (ACO), or a post-acute care (PAC) provider (skilled nursing facility, inpatient rehabilitation facility, or a home health agency) that is not an Episode Initiator; that participates in EQIP Activities; and with whom an Episode Convener has executed a Sharing Partner Arrangement.
- ▶ Target Price The Benchmark Price reduced by the Discount Factor.



CPT trigger codes used for orthopedics episodes

Episode	CPT Triggers
Hip Replacement &	27125, 27130, 27132, 27134, 27137, 27138, \$2118
Hip Revision	
Knee Arthroscopy	29866, 29867, 29868, 29870, 29871, 29873, 29874, 29875,
	29876, 29877, 29879, 29880, 29881, 29882, 29883, 29884,
	29888, 29889
Knee Replacement &	27446, 27447, 27486, 27487
Knee Revision	
Lumbar Laminectomy	63005,63011,63012,63017,63030,63035,63042,63044,
	63047, 63056, 63057, S2350, S2351
Lumbar Spine Fusion	22533, 22558, 22612, 22630, 22633, 22800
Shoulder Replacement	23470, 23472, 23473, 23474

CPT trigger codes used for GI episodes

Episode	CPT Triggers
Colonoscopy	44388, 44389, 44392, 44394, 44403, 44404, 45330, 45331, 45333, 45335, 45338, 45378, 45380, 45381, 45384, 45385, 45390, G0104, G0105, G0106, G0120, G0121, G0122
Colorectal Resection	44140,44141,44143,44144,44145,44146,44147,44150,44151,44155, 44156,44157,44158,44160,44204,44205,44206,44207,44208,44210, 44211,44212,45110,45111,45112,45113,45114,45116,45119,45123, 45126,45160,45170,45171,45172,45395,45397
Gall Bladder Surgery	47562, 47563, 47564, 47600, 47605, 47610, 47612, 47620
Upper GI Endoscopy	43200, 43201, 43202, 43204, 43205, 43206, 43211, 43212, 43213, 43214, 43215, 43216, 43217, 43219, 43220, 43226, 43227, 43228, 43229, 43231, 43232, 43233, 43234, 43235, 43236, 43237, 43238, 43239, 43240, 43241, 43242, 43243, 43244, 43245, 43246, 43247, 43248, 43249, 43250, 43251, 43252, 43253, 43254, 43255, 43256, 43257, 43258, 43259, 43266, 43270

▶

CPT trigger codes used for cardiology episodes

Episode	CPT Triggers
CABG &/or Valve Procedures	33400, 33401, 33403, 33405, 33406, 33410, 33411, 33412, 33413, 33414, 33415, 33416, 33417, 33422, 33425, 33426, 33427, 33430, 33460, 33463, 33464, 33465, 33472, 33474, 33475, 33476, 33478, 33496, 33510, 33511, 33512, 33513, 33514, 33516, 33517, 33518, 33519, 33521, 33522, 33523, 33530, 33533, 33534, 33535, 33536, 33860, 33861, 33863, 33864, 33870
Coronary Angioplasty	92920, 92921, 92924, 92925, 92928, 92929, 92933, 92934, 92937, 92938, 92941, 92943, 92944, 92973, 92980, 92981, 92982, 92984, 92995, 92996, C9600, C9601, C9602, C9603, C9604, C9605, C9606, C9607, C9608, G0290, G0291
Pacemaker / Defibrillator	0319T, 0321T, 0387T, 33206, 33207, 33208, 33212, 33213, 33214, 33221, 33224, 33225, 33227, 33228, 33229, 33230, 33231, 33240, 33249, 33262, 33263, 33264, 33270, 33271, 71090, C1721, C1722, C1785, C1786, C1882, C2619, C2620, C2621, G0448

43

Trigger codes used for ED episodes

The following codes are used to trigger both the "Efficient Admissions" episode and "High-Frequency ED Users" episode:

Code Type	Triggers
СРТ	99281, 99282, 99283, 99284, 99285
Revenue Code	045X

ICD-10 trigger codes used for ED episodes*

secondary diagnosis codes

▶ The following codes are further used to determine if a patient in the "Efficient Admissions" episode has a qualifying diagnosis:

Episode	ICD-10Triggers
Chest Pain	R07.1, R07.2, R07.9, R07.81, R07.89
Syncope	R55,T67.1XXA, G90.01
CHF	150.1, 150.20, 150.21, 150.22, 150.23, 150.30, 150.31, 150.32, 150.33, 150.40, 150.41, 150.42, 150.43, 150.9
Skin & Soft Tissue Infection	L08.0, L08.1, L08.81, L08.82, L08.89, L08.9, K12.2, L03.011, L03.012, L03.019, L03.031, L03.032, L03.111, L03.112, L03.113, L03.114, L03.115, L03.116, L03.119, L03.211, L03.213, L03.221, L03.311, L03.312, L03.313, L03.313, L03.315, L03.317, L03.317, L03.319, L03.811, L03.90, N48.22, H05.011, N61.0, N61.1, L01.00, L01.03, L02.01, L02.11, L02.211, L02.213, L02.214, L02.215, L02.213, L02.223, L02.231, L02.411, L02.412, L02.413, L02.414, L02.415, L02.419, L02.423, L02.423, L02.414, L02.511, L02.611, L02.611, L02.611, L02.611, L02.811, L02.811, L02.91, L02.91
Asthma/COPD	J44.0, J44.1, J44.9, J45.20, J45.22, J45.30, J45.31, J45.32, J45.40, J45.41, J45.42, J45.50, J45.51, J45.52, J45.90, J45.901, J45.902, J45.909, J45.999, J45.998
Deep Vein Thrombosis	182.401, 182.402, 182.403, 182.409, 182.411, 182.412, 182.413, 182.419, 182.421, 182.422, 182.423, 182.429, 182.431, 182.432, 182.433, 182.439, 182.431, 182.432, 182.433, 182.439, 182.441, 182.442, 182.443, 182.449, 182.451, 182.452, 182.453, 182.459, 182.451, 182.452, 182.451, 182.452, 182.451, 182.452, 182.451, 182.452, 182.453, 182.459, 182.511, 182.512, 182.512, 182.513, 182.519, 182.521, 182.523, 182.523, 182.523, 182.533, 182.539, 182.541, 182.542, 182.543, 182.549, 182.551, 182.552, 182.553, 182.559, 182.563, 182.563, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.563, 182.569, 182.561, 182.562, 182.562, 182.563, 182.569, 182.561, 182.562, 182
Pneumonia	J18.0, J18.1, J18.2, J18.8, J18.9, B96.1, J10.00, J10.08, J11.00, J11.08, J12.2, J12.9, J13., J15.1, J15.212, J15.5, J15.6, J15.7, J15.8, J15.9, J16.0, J16.8
Atrial Fibrillation	148.0,148.11,148.19,148.20,148.21,148.3,148.4,148.91,148.92
Hyperglycemia with Diabetes Mellitus	E10.65, E11.65, E13.65, E09.65, E08.65, R73.9

*Certain exclusions are applied including: patients with ICU or OR costs, patients with prior ED visits, and patients with certain

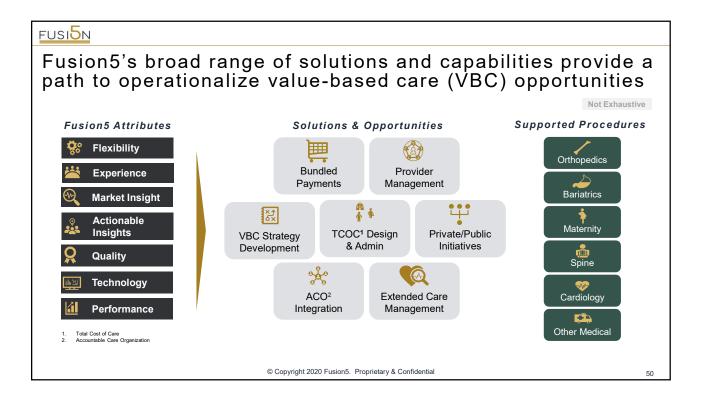
Appendix 2: Info from nationally experienced episode conveners/contractors

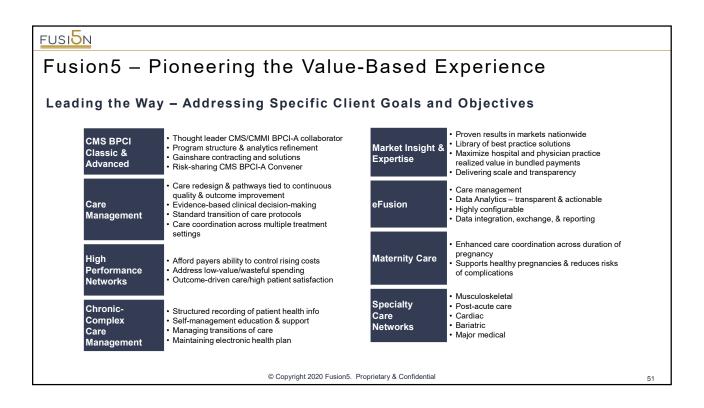
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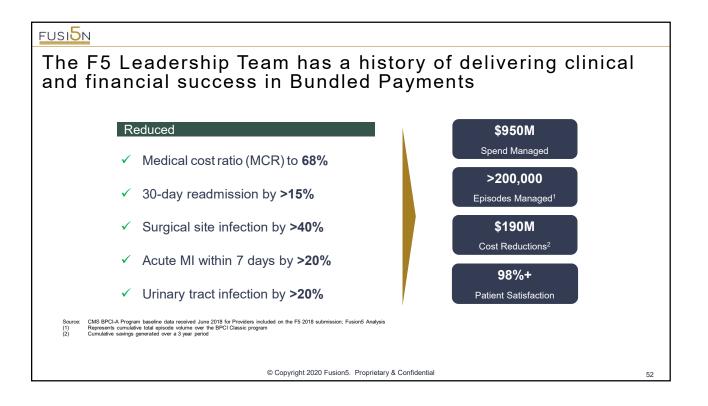
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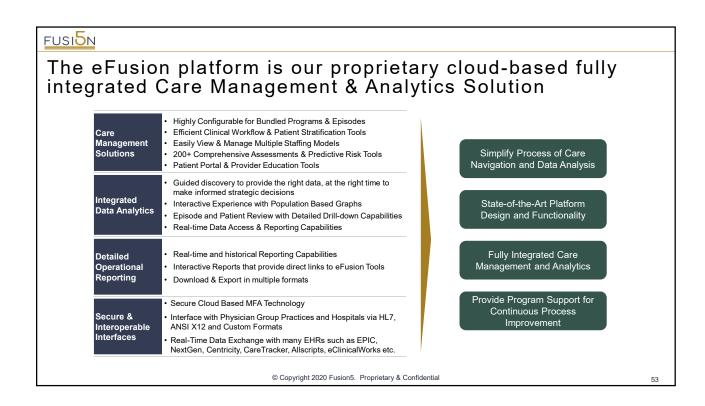
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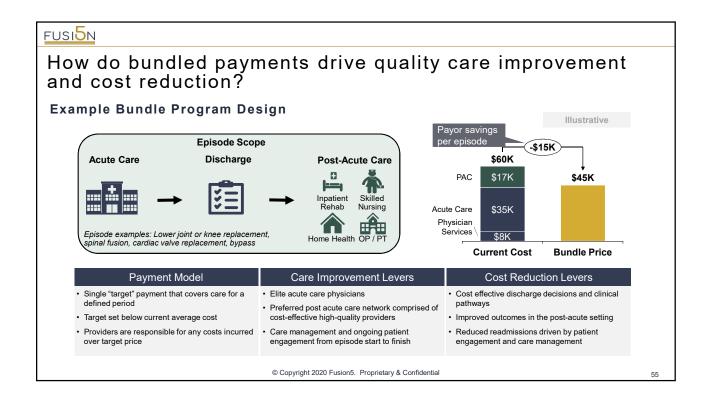


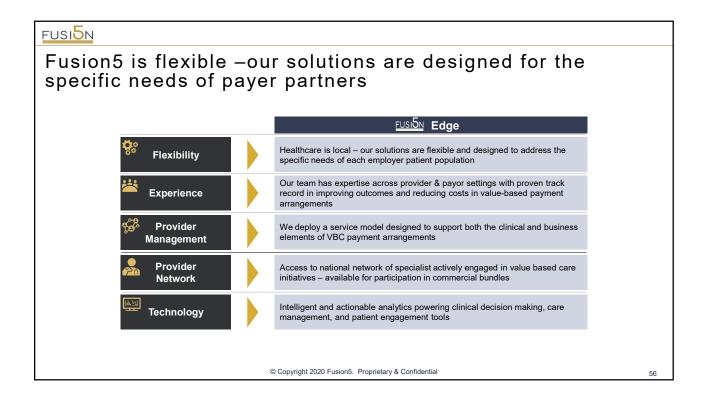




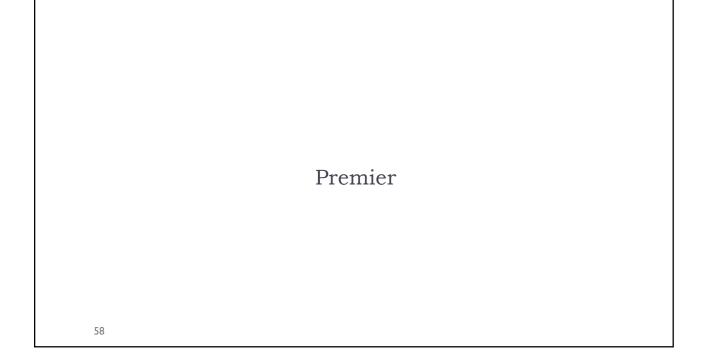


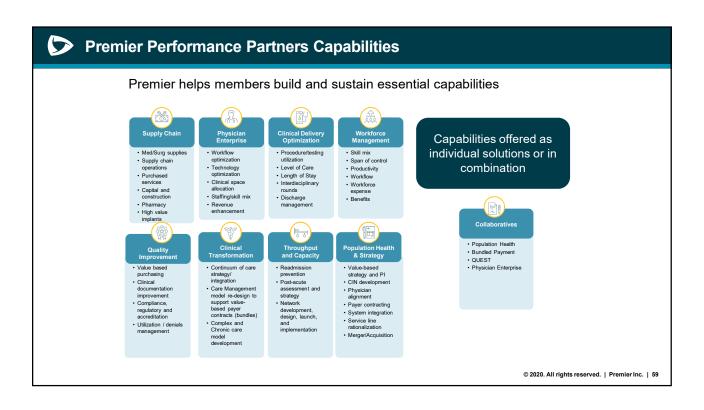


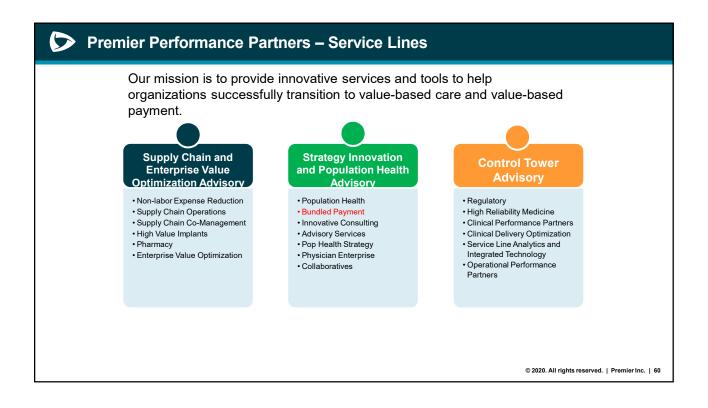


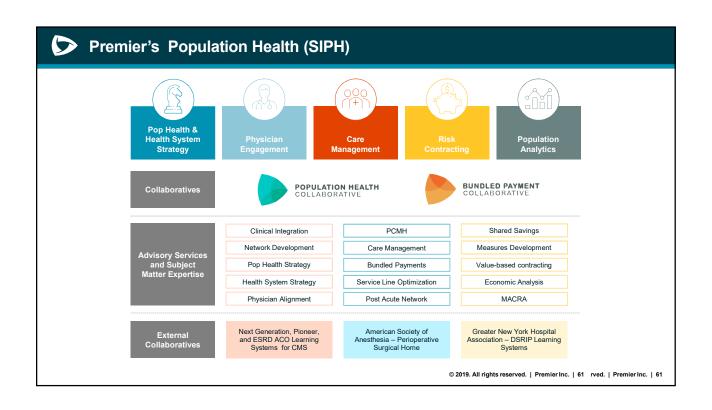


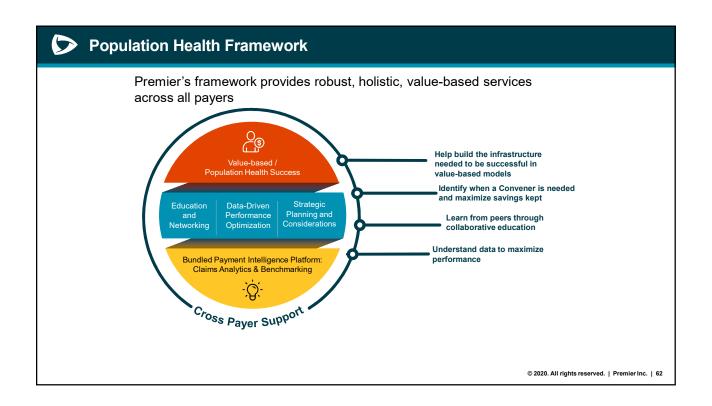
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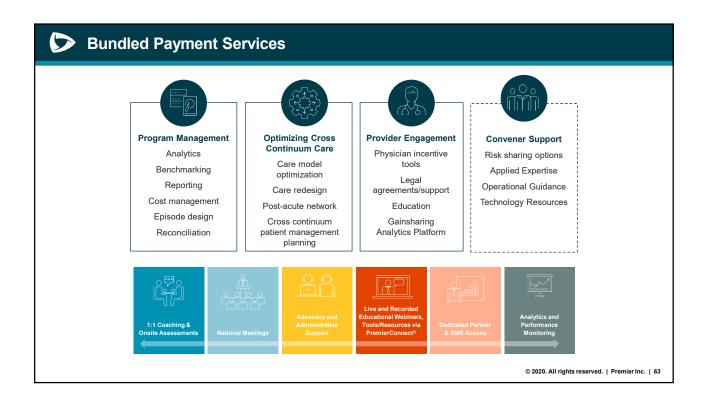














Premier's Population Health Support in Maryland

Population Health Management (PHM) Collaborative provides support for TCOC and all Maryland programs beyond MSSP

- PHM Collaborative currently supports members through:
 - Maryland Affinity Group
 - On-site strategy sessions
 - Monthly Dedicated Partner calls and quarterly data 1:1 calls

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	Premier Does Not Share Risk	Premier Shares Risk
	Health System Convener	Partner Convener
	Health System takes on risk and is the Convening Entity for PGPs with underlying support from Premier	Premier and Health System share Convener responsibilities and risk with joint program support.
	Premier provides education and analytics support through the Bundled Payment Collaborative (BPC).	Premier and Health System will mutually develop PGP evaluation criteria to determine which PGPs would be appropriate for a Partner Convener model.
		Analytics and education are provided through Premier's BPC and Premier will take an active role in program management.
	PGP Convener	Premier Convener
	PGPs are their own Conveners with Health System messaging Premier Collaborative support	Premier will evaluate Convener option on behalf of PGPs without the direct support of the Health System
and analytics support,		Premier will work with PGPs on direct management of the model and share risk based on their respective contributions to model success.
	 Premier and Health System do not take an active role in program administration or risk sharing. 	Premier will develop PGP evaluation criteria to determine whether to move forward as a Convener on behalf of PGPs.
		The level of direct management and risk sharing will be determined on a case-by-case basis contingent upon the PGPs' readiness for EQIP.



Premier EQIP Contact Information

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Signify (formerly known as Remedy)

67

We Implement Episode of Care Programs At Scale

Signify Manages \$8 Billion Worth of Episodes Annually

- Largest operator of episodes of care payment programs in the U.S.; working with payers, providers, and employers – including two Blue plans, large Medicaid plan, regional health plans and the State of Connecticut
- Deepest and broadest pool of experts in episode of care payments and benefits programs in the U.S.
- Flexible administrative platform to manage prospective and retrospective programs
- Systematic improvement in clinical and financial outcomes

 readmission and complication reductions as well as
 social determinants of health

Fully scalable episode program covering up to 70% of medical spend

Comprehensive network of providers already taking risk on Medicare priced episodes

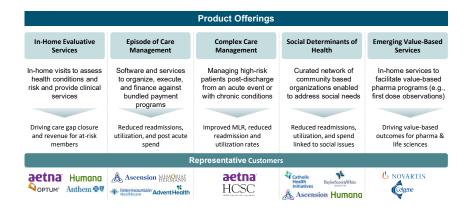
Full provider engagement suite integrated into EMRs

Our goal is to create a market that will deliver high value healthcare every day to everyone

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Our Suite Of Technology-Enabled Services Help Our Partners Better Manage Patients and Improve Outcomes



69

We Provide Support In Any Number Of Ways

We'll take your lead

- ✓ Provider network contracting strategy
- √ Episodes of care contracting
- ✓ Target pricing
- √ Provider support & reporting
- √ ASO customer engagement
- ✓ Program reports& evaluation



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Why Episodes Of Care?

It's an essential component of the VBP tapestry for MA or Commercial plans

- PCP-based programs help manage upstream care
- ACO-based programs help focus on total costs of care
- Consumer activism works on discretionary services

- Episodes of care extend the PCP's reach to specialists
- Episodes of care optimize ACOs by reducing the impact of leakage
- Episodes create comprehensive price transparency

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Episodes of Care from Signify

Principles & Ingredients

- · Full transparency on information/analytics to create trust with providers and employers
- Guaranteed value improvement Signify guarantees the target price, which is essential to employers, and can include mandatory quality gates depending on program design
- · Warranty period on each episode, procedural or condition
- Ability to manage a member within multiple Episodes simultaneously which is essential to engage specialists
- · Ability to risk-adjust at scale, ensuring fairness in pricing
- · Sophisticated network tiering based on quality and cost, adapted to Humana needs
- · Broad scope of episodes covering more than 50% of all medical spend



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Scope of EOC Payment Programs

We Can Use And Leverage All Episode Definitions For Your EOC Program

Procedures

Cardiology: PCIs, Pacemaker-Defibrillator, CABG/Cardiac Valve

GI: Bariatric, Gall Bladder, Colonoscopy, Upper GI Endoscopy, Colorectal Resection

Ortho: Hip Replacement, Knee Replacement, Knee Arthroscopy, Shoulder Replacement, Lumbar Laminectomy, Lumbar Spine Fusion

Ophthalmology: Cataract Surgery

Women's Health: Hysterectomy, Mastectomy, Breast Biopsy

Men's Health: Prostatectomy, TURP

Maternity:

Mother: Pregnancy, C-Section and Vaginal Delivery Baby: Newborn

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Chronic Conditions

Major Chronic Conditions: Asthma, COPD, Diabetes, CAD, Hypertension, CHF, Arrhythmias/Heart Block, GERD, Crohn's Disease, Diverticulitis

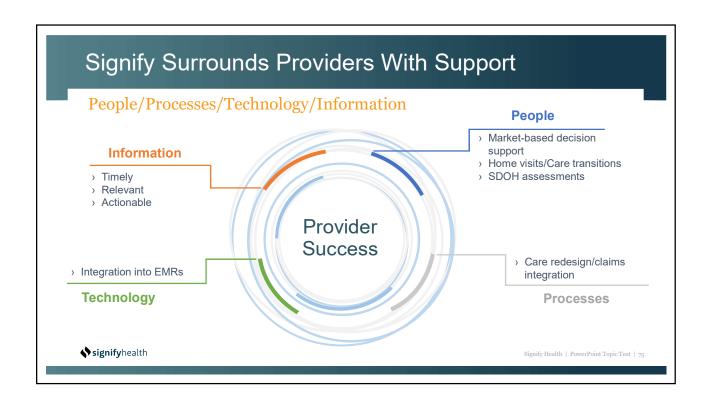
Ortho: Low Back Pain, Osteoarthritis

Behavioral Heath: Substance Use Disorders, Depression, PTSD, Bipolar, Schizophrenia

Oncology: Breast Cancer, Colon Cancer, Rectal Cancer, Lung Cancer, Prostate Cancer, Gynecologic Cancer

Instead of paying all the claims costs, w/o regard to appropriateness, Episodes redefine the unit of service to pay one "target price" for the entire duration of care appropriate to each Episode, plus a warranty period.

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Appendix 3: Overlaps and FAQs*

* State is currently in discussions/negotiations with CMMI on EQIP, thus everything is subject to change.

ECIP vs EQIP-Y1 (2021): No overlaps in episodes

Ech vs Eqn-11 (2021). No overlaps in episodes			
	ECIP	EQIP-YI	
Who convenes/controls?	Hospitals	Non-hospital conveners (but could be hospital-established entity)	
Episode triggers	Hospital inpatient	HOPD and non-hospital setting	
Medicare costs included	All FFS Parts A&B 90 days post discharge. Excludes hospital costs	All FFS Parts A&B – maybe some D in future. Generally 90 days. Includes hospital costs	
Accounting for GBR feedback effects	Not applicable	Conveners given only partial credit (~65%) for savings from hospital utilization	
Advanced APM (for MACRA purposes)?	Yes. Generous QP calculation	Yes. Standard QP calculation	
Downside financial risk?	Indirectly borne by hospitals via global budgets and MPA – and paid for by all hospitals via MPA lever	Directly borne by conveners	
Payments from CMS	Via MPA lever	Directly to/from conveners	
Optional incentive payments with partners	Hospital can share upside payments with downstream partners	Convener can share upside and downside payments to/from downstream partners	
78			

ECIP vs. EQIP-Y2+

- EQIP may include inpatient-triggered episodes beginning in 2022
- ▶ HSCRC staff have previously noted that ECIP could be modified to include:
 - ▶ Episodes triggered outside of inpatient setting, and
 - Spending occurring within hospitals
- In federal BPCI-Advanced, both hospitals and physicians can participate
 - When an episode occurs at a participating hospital triggered by physicians participating on their own (separate from hospital participation), then the physician "wins" the episode
- ▶ State's expectation is that ECIP/EQIP overlap policy would reflect BPCI-A:
 - ECIP hospital signs up for particular episodes and is responsible for them unless:
 - An Episode Initiator (EI) is signed up with an EQIP Convener that participates in that exact same episode triggered in that hospital. In this case, EQIP "wins" the episode
- 79

FAQs answered by State (CMMI may disagree and their determination will be binding)

- Can an Initiator/partner participate in both ECIP and EQIP?
 - ➤ Yes. For 2021, there is no overlap between episodes. ECIP Hospitals may partner with Care Partners for inpatient-triggered episodes. EQIP Conveners may sign up those same providers for the outpatient-triggered episodes
 - ▶ In 2022+, if there is an overlapping episode, EQIP will "win"
 - If the ECIP Hospital has chosen an episode and, for a particular beneficiary, the initiating doctor is in EQIP, then the EQIP Convener will win that particular episode
 - If the ECIP hospital has chosen an episode and, for a particular beneficiary, the initiating doctor is NOT in EQIP, then the ECIP Hospital will win that particular episode
- Any policies for ACO/EQIP overlaps?
 - Current thought: EQIP will exclude all prospectively attributed ACO beneficiaries
 - ▶ State will need CMMI to provide the ACO lists in order to effectuate
 - ▶ State not very concerned if CMMI does not provide lists (see next slide)
- 80

FAQs answered by State (CMMI may disagree and their determination will be binding), p. 2

- ▶ If EQIP payments are made for the same beneficiaries for which an ACO received a payment, isn't there concern about double payments?
 - Maybe, but that will be on the State to manage
 - ▶ Under the Maryland Model, CMMI is guaranteed certain levels of Medicare savings statewide in exchange for the flexibility and levers provided to the State
 - ▶ The State seeks to encourage broad participation in Advanced Alternative Payment Models
 - If widespread participation in both downside ACOs and EQIP leads to double payments on the same beneficiaries, it is not clear that this would increase Maryland's TCOC by more than the savings produced, given the savings guaranteed to Medicare
 - ▶ If those payments did increase Maryland's TCOC overall, the State could use other levers that did not directly penalize those organizations accepting downside risk



FAQs answered by State (CMMI may disagree and their determination will be binding), p. 3

- Are EQIP payments taken into account for hospitals' Care Transformation Initiatives? Isn't CMMI worried about double payments?
 - No. Any amounts paid for CTIs are offset from all hospitals and therefore do not affect net payments to/from Medicare
- Will EQIP payments affect Maryland TCOC financial tests?
 - Yes
 - ▶ Payments to Conveners will count as additional costs but are only made if the Convener has beaten the 3% Discount for TCOC (guaranteed savings to Medicare)
 - ▶ Payments from Conveners will be counted as savings under the Model, because they are paying for the costs for which they did not beat the 3% Discount
 - ▶ Either way, EQIP is beneficial to the State and CMS (Medicare), at the price of Medicare paying Conveners for savings in excess of the 3% discount

